

EXHIBIT 2

In the Matter Of:
SCOTT L. HULTNER, et al.
VS
ANCHOR-DARLING VALVE COMPANY, et al.

Scott L. Hultner, Volume I
August 05, 2024

Scott L. Hultner, Volume I
August 05, 2024

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

LAOSD ASBESTOS CASES

JCCP NO. 4674

SCOTT L. HULTNER and
GERALDINE E. HULTNER,

CASE NO. 24STCV04699

Plaintiffs,

**CERTIFIED
ORIGINAL**

VS.

ANCHOR/DARLING VALVE
COMPANY, et al.

Defendants.

(Pages 1 - 86)

*** AND ***

Scott L. Hultner, Volume I
August 05, 2024**Page 2**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISIONSCOTT L. HULTNER and
GERALDINE E. HULTNER,

Plaintiffs,

VS.

AIR & LIQUID SYSTEMS
CORPORATION (sued
individually and as
successor-interest to
BUFFALO PUMPS, INC.), et al.)

Defendants.

CASE NO.

8:24-cv-00409-JLS-DFM

(Pages 1 - 86)

ORAL VIDEOCONFERENCE AND VIDEOTAPED DEPOSITION OF
SCOTT L. HULTNER
MONDAY, AUGUST 5, 2024
Volume I
Trial Preservation
(REPORTED REMOTELY)

Reported By: PENNY L. PABITZKY, CSR, RPR
CA CSR NO. 13235
TX CSR NO. 5040
WA CSR NO. 22004153

Job Number 310000

Scott L. Hultner, Volume I
August 05, 2024**Page 67**

1 A. Yes.

2 MR. ARCHER: Hey, Geri.

3 MRS. HULTNER: Hey.

4 BY MR. ARCHER:

5 Q. When you worked -- when you were in the Navy
6 doing this work on these things that we've been talking
7 about today, did you expect that the work you were
8 doing on the equipment and whatnot was going to hurt
9 you?

10 A. No. There was no warning, precaution signs.
11 You know, there's no -- in the kits you would get for
12 the replacement material, the gaskets and packing,
13 whatnot, there's no note in there, "Be sure to wear
14 proper protective equipment. Do not breathe dust."
15 That was never -- that was never brought up.

16 Q. Did you ever get any warnings from the
17 manufacturers of these products that asbestos was in
18 these products and you should be careful breathing any
19 dust from any work --

20 A. No.

21 Q. -- you were doing on them?

22 A. No.

23 MS. REEG: Assumes facts, lacks foundation,
24 calls for speculation.

25 BY MR. ARCHER:

Scott L. Hultner, Volume I
August 05, 2024

Page 86

CERTIFIED STENOGRAPHER'S CERTIFICATE

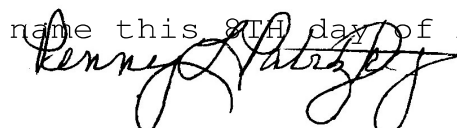
I, PENNY L. PABITZKY, Certified Shorthand Reporter,
Certificate No. 13235, for the State of California, do
hereby certify to the following:

The foregoing proceedings were taken before me at
the time and place set forth, at which time being duly
authorized to administer oaths pursuant to Section
2093(b) of the California Code of Civil Procedure, I
certify the witness in the foregoing deposition was by
me duly sworn to testify and placed under oath by me;

That said deposition was taken at the time stated
via remote conferencing; that the testimony of said
witness was reported stenographically to the best of my
ability due to the nature of remote communications and
thereafter transcribed by me;

I further certify that I am neither counsel for nor
related to any party to said action, nor in any way
interested in the outcome thereof.

In witness whereof, I have hereunto subscribed my
name this 8TH day of August, 2024.



Penny L. Pabitzky, CSR, RPR
California CSR 13235 - Expires 07/31/25
INDEPENDENT CONTRACTOR FOR:
GOUCHER PARKER SPIVEY
P.O. Box 348
Millbury, Massachusetts 01527 214-347-4781
California Firm Registration Number 103

In the Matter Of:
SCOTT L. HULTNER, et al.
VS
ANCHOR-DARLING VALVE COMPANY, et al.

Scott L. Hultner, Volume II
August 13, 2024

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

LAOSD ASBESTOS CASES

JCCP NO. 4674

SCOTT L. HULTNER and
GERALDINE E. HULTNER,

CASE NO. 24STCV04699

Plaintiffs,

**CERTIFIED
ORIGINAL**

VS.

ANCHOR/DARLING VALVE
COMPANY, et al.

Defendants.

(Pages 87 – 291)

*** AND ***

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

SCOTT L. HULTNER and)
GERALDINE E. HULTNER,)
)
Plaintiffs,)
)
VS.) CASE NO.
) 8:24-CV-00409-JLS-DFM
AIR & LIQUID SYSTEMS)
CORPORATION (sued)
individually and as)
successor-interest to)
BUFFALO PUMPS, INC.), et al.)
)
Defendants.) (Pages 87 - 291)

ORAL VIDEOCONFERENCE AND VIDEOTAPED DEPOSITION OF
SCOTT L. HULTNER
TUESDAY, AUGUST 13, 2024
VOLUME II
TRIAL PRESERVATION
(REPORTED REMOTELY)

Reported By: PENNY L. PABITZKY, CSR, RPR
CA CSR NO. 13235
TX CSR NO. 5040
WA CSR NO. 22004153

Job Number 310238

1 I believe the John Adams had ship service turbine
2 generators just like were at the prototype.

3 A. That's correct.

4 Q. And, again, we talked about those similar to
5 the Juneau. You have a turbine end, which is the M
6 division jurisdiction. You have a generator, which is
7 the E division jurisdiction. Right?

8 A. Yep. That's true.

9 Q. Is it fair that outside of that overhaul you
10 never personally or saw others do repair or maintenance
11 on the ship surface turbine generators outside of the
12 overhaul?

13 MR. ARCHER: Overbroad as to "never,"
14 assumes facts.

15 A. We did have a -- we did have a steam leak on
16 the flange coming in that we repaired at sea. We had
17 to shut down the -- one side. We had two -- two lines
18 coming in, two engines, two turbines. We shut down one
19 side to repair a steam leak on there.

20 BY MR. JAMISON:

21 Q. And is that the main steam pipe coming into
22 the turbine generator?

23 A. Yes.

24 Q. And that's the steam that's coming from the
25 reactor compartment through from -- from the steam

1 generators through the piping to the -- and abutting --
2 it's a large pipe --

3 A. Yeah --

4 Q. -- the actual turbine generator. And is --
5 is that right?

6 A. That's right.

7 Q. Okay. And so, essentially, you would shut
8 down one of the main propulsions and the ship service
9 turbine generator on one side of the ship, allow that
10 to cool, go cold iron. So then you were able to remove
11 that flange and re- -- re- -- repair the gasket that
12 goes into that.

13 A. That's absolutely correct.

14 Q. Okay. And this occurred before the
15 overhaul?

16 A. After.

17 Q. After the overhaul.

18 At that point in time, you were a machinist's
19 mate first class.

20 A. I believe I was a B-5.

21 Q. Is that --

22 A. Wait a minute. Yeah, I was a -- I was a
23 first class.

24 Q. Okay. And there's a -- when something like
25 that happens, does that fall under a planned

1 maintenance card, at least giving the directions on how
2 to get it done?

3 A. That's not a planned maintenance. That's
4 a -- that's an emergency maintenance.

5 Q. There's some maintenance component, though,
6 that describes how a machinist's mate should go about
7 resolving this issue, planned or not planned, right?

8 A. There's always guidelines.

9 Q. And was it -- were -- were you on watch when
10 that issue was discovered?

11 A. I was not. But when I came on watch, the
12 chief petty officer and another first class were --
13 were fixing the problem.

14 Q. Okay. Was that problem fixed by the time
15 that you went off your shift?

16 A. Off the ship?

17 Q. Shift.

18 A. Oh, shift. No. It was a long repair. I
19 think it was, like, eight, ten hours.

20 Q. Okay. And so we have a chief, and we have a
21 first class who have presumably turned off the ship
22 service turbine generator so there's no steam going to
23 it.

24 A. On one side.

25 Q. And it's cool now. And -- and when you come

CERTIFIED STENOGRAPHER'S CERTIFICATE

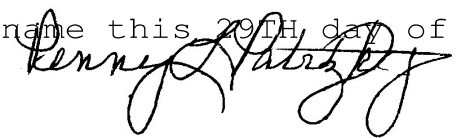
I, PENNY L. PABITZKY, Certified Shorthand Reporter, Certificate No. 13235, for the State of California, do hereby certify to the following:

The foregoing proceedings were taken before me at the time and place set forth, at which time being duly authorized to administer oaths pursuant to Section 2093(b) of the California Code of Civil Procedure, I certify the witness in the foregoing deposition was by me duly sworn to testify and placed under oath by me;

That said deposition was taken at the time stated via remote conferencing; that the testimony of said witness was reported stenographically to the best of my ability due to the nature of remote communications and thereafter transcribed by me;

I further certify that I am neither counsel for nor related to any party to said action, nor in any way interested in the outcome thereof.

In witness whereof, I have hereunto subscribed my name this 29th day of AUGUST, 2024.


Penny L. Pabitzky, CSR, RPR
California CSR 13235 - Expires 07/31/25
INDEPENDENT CONTRACTOR FOR:
GOUCHER PARKER SPIVEY
P.O. Box 348
Millbury, Massachusetts 01527 214-347-4781
California Firm Registration Number 103

In the Matter Of:
SCOTT L. HULTNER, et al.
VS
ANCHOR-DARLING VALVE COMPANY, et al.

Scott L. Hultner, Volume III
August 14, 2024

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

LAOSD ASBESTOS CASES

) JCCP NO. 4674

SCOTT L. HULTNER and
GERALDINE E. HULTNER,

) CASE NO. 24STCV04699

)
)
)
) Plaintiffs,

**CERTIFIED
ORIGINAL**

)
) VS.

)
) ANCHOR/DARLING VALVE
COMPANY, et al.

)
) Defendants.

) (Pages 292 - 404)

*** AND ***

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

SCOTT L. HULTNER and)
GERALDINE E. HULTNER,)
)
Plaintiffs,)
)
VS.) CASE NO.
) 8:24-CV-00409-JLS-DFM
AIR & LIQUID SYSTEMS)
CORPORATION (sued)
individually and as)
successor-interest to)
BUFFALO PUMPS, INC.), et al.)
)
Defendants.) (Pages 292 - 404)

ORAL VIDEOCONFERENCE AND VIDEOTAPED DEPOSITION OF
SCOTT L. HULTNER
WEDNESDAY, AUGUST 14, 2024
VOLUME III
TRIAL PRESERVATION
(REPORTED REMOTELY)

Reported By: PENNY L. PABITZKY, CSR, RPR
CA CSR NO. 13235
TX CSR NO. 5040
WA CSR NO. 22004153

Job Number 310300

1 Q. And, again, it's your testimony that, to
2 your recollection, looking back over 40 years that no
3 one on that ship wore respirators or masks. Is that
4 true?

5 A. None of the Navy personnel or our people
6 didn't.

7 Q. Well -- and I want to ask about --

8 A. I don't remember anybody wearing masks on
9 there. But then, again, we weren't concerned with what
10 they were doing. They had their jobs. We had our
11 jobs.

12 Q. And, sir -- and not to belabor the point --
13 and I think I may be done with documents.

14 And to recap, the Navy's well aware of the
15 dangers of asbestos based upon the documents I've shown
16 to you --

17 MR. ARCHER: Found -- foundation --

18 MR. JAMISON: Can I finish my question?

19 MR. ARCHER: I'm sorry.

20 BY MR. JAMISON:

21 Q. Based upon the documents I've shown you --
22 and we can go deeper. Based upon what you've read so
23 far, both before and during the time that you're
24 serving in the Navy, your employer is aware of the
25 dangers of asbestos exposure. True?

1 MR. ARCHER: Foundation, assumes facts not
2 in evidence --

3 A. The employer may be aware --

4 MR. ARCHER: -- speculation.

5 A. The employer may be aware, but I'm not -- I
6 don't know that they made us aware.

7 BY MR. JAMISON:

8 Q. Would you agree with me that at somewhere
9 above you that there's a breakdown in the chain of
10 command with regards to safety?

11 A. Absolutely.

12 MR. ARCHER: Foundation, assumes fact,
13 speculation.

14 BY MR. JAMISON:

15 Q. Had you been aware that the Navy was
16 requiring the use of respirators and masks, you would
17 have worn those?

18 A. Had --

19 MR. ARCHER: Objection; assumes facts,
20 speculation.

21 A. Had they been provided and then we were told
22 to wear them for our safety, we would have worn them.

23 BY MR. JAMISON:

24 Q. If the Navy had -- we can agree that all of
25 the work obligations for protecting oneself, handling

1 of the materials, and the notion of not working around
2 friable asbestos was not enforced by your employer?

3 MR. ARCHER: Compound, assumes facts,
4 overbroad, argumentative.

5 A. By "enforced," you mean forcing us to wear
6 any protective -- we were not -- no. We were not
7 provided PPE.

8 BY MR. JAMISON:

9 Q. Do you have any idea why -- why the vast
10 many documents that I've shown you and could show you,
11 why that information never got down to your level?

12 MR. ARCHER: Speculation, assumes facts,
13 overbroad.

14 A. My only reason would be -- I don't know.
15 Maybe they didn't -- it just didn't come down to us,
16 for whatever reason.

17 BY MR. JAMISON:

18 Q. You have sued a number of defendants in this
19 case. And -- and recognizing what the Navy knew and
20 what the Navy was at least telling people in memos and
21 regulations and whatnot that was needed to be enforced,
22 what more could the equipment manufacturers have done
23 to warn you?

24 A. Not used asbestos.

25 MR. ARCHER: Speculation, calls for expert

1 said and then whatever repair was needed if it broke.

2 Q. During the course of ordering materials, you
3 yourself never had any contact with anybody off -- off
4 the ship; is that correct?

5 A. I -- we dealt with our supply parts petty
6 officer.

7 Q. So you do not know who your supply parts
8 petty officer may have spoken with in order to get the
9 parts necessary to do the repairs and overhaul that you
10 were responsible for aboard John A. Adams, correct?

11 A. He would have went to the officer -- supply
12 officer to tell him what he needed, and he would have
13 went and got the materials.

14 Q. And you don't know who the supply officer
15 went to in order to procure the materials. Is that
16 also correct?

17 A. He would have went to the manufacturer of
18 the component. He wouldn't have went to a third party.

19 Q. Do you have any evidence that you can point
20 to that would indicate that your supply officer went to
21 the manufacturer of the component in order to procure
22 spare parts and component parts?

23 A. Just my knowledge that whatever repair parts
24 we got were exact fit to the component we were working
25 on. It wasn't a, you know, half-inch gasket sticking

1 out here or a quarter inch here. It was an exact
2 replica built for that component. So that tells me it
3 was supplied by the manufacturer of the component.

4 Q. And as --

5 A. And they may not have -- they may not
6 have -- they may not have manufactured it. But they
7 bought it from somebody that manufactured it to the
8 spec that the component manufacturer gave them and they
9 provided it. It's not like --

10 Q. Do you have any understanding --

11 A. Sorry. I was going to say it's not like
12 going to Walmart and buying a gasket for a pump because
13 you need a gasket. You have to go to the manufacturer
14 to get the exact fit.

15 Q. Do you have any understanding of what a
16 manufacturer was required to supply to the
17 United States Navy when it sold pumps, valves, any
18 other equipment to the Navy? Do you know what that
19 manufacturer was required to supply?

20 A. I know the Navy requested a component to do
21 a certain job and they -- and they described what that
22 component needed to do. And that manufacturer would
23 bid on it. Several manufacturers probably bid on it.
24 And then they would pick out a -- a winner. And that
25 manufacturer would provide that equipment to the spec

CERTIFIED STENOGRAPHER'S CERTIFICATE

I, PENNY L. PABITZKY, Certified Shorthand Reporter, Certificate No. 13235, for the State of California, do hereby certify to the following:

The foregoing proceedings were taken before me at the time and place set forth, at which time being duly authorized to administer oaths pursuant to Section 2093(b) of the California Code of Civil Procedure, I certify the witness in the foregoing deposition was by me duly sworn to testify and placed under oath by me;

That said deposition was taken at the time stated via remote conferencing; that the testimony of said witness was reported stenographically to the best of my ability due to the nature of remote communications and thereafter transcribed by me;

I further certify that I am neither counsel for nor related to any party to said action, nor in any way interested in the outcome thereof.

In witness whereof, I have hereunto subscribed my name this 28TH day of AUGUST, 2024.



Penny L. Pabitzky, CSR, RPR
California CSR 13235 - Expires 07/31/25
INDEPENDENT CONTRACTOR FOR:
GOUCHER PARKER SPIVEY
P.O. Box 348
Millbury, Massachusetts 01527 214-347-4781
California Firm Registration Number 103

In the Matter Of:
SCOTT L. HULTNER, et al.
VS
ANCHOR/DARLING VALVE COMPANY, et al.

Scott Hultner
August 21, 2024

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

LAOSD ASBESTOS CASES)	JCCP NO. 4674
<hr/>)	
SCOTT L. HULTNER and)	CASE NO. 24STCV04699
GERALDINE E. HULTNER,)	
)	
Plaintiffs,)	CERTIFIED ORIGINAL
VS.)	
)	
ANCHOR/DARLING VALVE)	
COMPANY, et al.)	
)	
Defendants.)	(Pages 858 - 1040)

*** AND ***

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

SCOTT L. HULTNER and)
GERALDINE E. HULTNER,)
)
Plaintiffs,)
)
VS.) CASE NO.
) 8:24-CV-00409-JLS-DFM
AIR & LIQUID SYSTEMS)
CORPORATION (sued)
individually and as)
successor-interest to)
BUFFALO PUMPS, INC.), et al.)
)
Defendants.) (Pages 858 - 1040)

ORAL VIDEOCONFERENCE AND VIDEOTAPED DEPOSITION OF
SCOTT L. HULTNER
WEDNESDAY, AUGUST 21, 2024
VOLUME VI
TRIAL PRESERVATION
(REPORTED REMOTELY)

Reported By: PENNY L. PABITZKY, CSR, RPR
CA CSR NO. 13235
TX CSR NO. 5040
WA CSR NO. 22004153

Job Number 310376

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

LAOSD ASBESTOS CASES) JCCP NO. 4674
_____))
SCOTT L. HULTNER and) CASE NO. 24STCV04699
GERALDINE E. HULTNER,)
Plaintiffs,)
VS.)
ANCHOR/DARLING VALVE)
COMPANY, et al.)
Defendants.) (Pages 858 - 1040)

*** AND ***

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

SCOTT L. HULTNER and)
GERALDINE E. HULTNER,)
Plaintiffs,)
VS.) CASE NO.
AIR & LIQUID SYSTEMS) 8:24-CV-00409-JLS-DFM
CORPORATION (sued)
individually and as)
successor-interest to)
BUFFALO PUMPS, INC.), et al.)
Defendants.) (Pages 858 - 1040)

ORAL VIDEOCONFERENCE AND VIDEOTAPED DEPOSITION
OF SCOTT L. HULTNER, VOLUME VI, commencing from
9:32 a.m. to 1:46 p.m., Pacific Time, Wednesday,

1 August 21, 2024, taken on behalf of the Plaintiffs and
2 pursuant to the California Rules of Civil Procedure
3 and the provisions stated on the record or attached
4 hereto and reported stenographically via remote
5 videoconference before PENNY L. PABITZKY, Certified
6 Shorthand Stenographer for the state of California, CSR
7 No. 13235, RPR.

8 For the taking of the deposition, the witness
9 was located in Seal Beach, California.

10 For the taking of the deposition, the certified
11 stenographer was located in Nederland, Texas.

12
13 CERTIFIED STENOGRAPHER'S NOTE: Please note that
14 due to the quality of a Zoom-type videoconference and
15 transmission of data and overspeaking, audio distortion
16 may occur, which may disrupt the process of preparing a
17 verbatim transcript.

18
19 Quotation marks are used for clarity and do not
20 necessarily reflect a direct quote.

21
22
23
24 Job Number 310376
25

1 A. I don't recall on the Juneau. We were there
2 two months.

3 Q. Was there overhaul work happening on the
4 Juneau?

5 A. Yes.

6 MR. JAMISON: Objection; incomplete --
7 BY MR. ARCHER:

8 Q. Was there --

9 MR. JAMISON: -- hypothetical, assumes
10 facts, misstates prior testimony.

11 THE CERTIFIED STENOGRAPHER: I did not get
12 the first objection. What was it?

13 MR. JAMISON: Incomplete hypothetical.
14 BY MR. ARCHER:

15 Q. Does overhaul work -- was there overhaul
16 work happening on the Juneau to the propulsion system?

17 A. Yes, it was. Yes, there was.

18 Q. Does that include the turbines or no?

19 A. It includes the entire system. As far as
20 what work was done on them, I don't recall that. But
21 work was done on the -- from the boilers to the
22 propeller.

23 Q. I'm not asking you for recall. That's for
24 the defense lawyers. I'm asking you for what you know.

25 A. I know we were in the shipyard for two and a

1 half -- it's almost two and a half months and work was
2 done, long days every day, on the propulsion system.

3 Q. Does that include the turbines, even if you
4 can't remember it?

5 MR. JAMISON: Objection.

6 A. Yes. It's part of -- part of the propulsion
7 system.

8 MR. JAMISON: Objection; leading, assumes
9 facts, lacks prior -- extensive prior testimony,
10 overbroad.

11 BY MR. ARCHER:

12 Q. Were there GE people in charge of work on
13 turbines during your career in the Navy?

14 MR. JAMISON: Objection; leading,
15 overbroad, assumes facts, lacks foundation.

16 A. On the John Adams, because that was a major
17 overhaul, yes.

18 BY MR. ARCHER:

19 Q. How did you --

20 MR. JAMISON: Strike those portions based
21 upon speculation.

22 BY MR. ARCHER:

23 Q. How did you know they were GE folks?

24 A. Would have been hard hat or white suit with
25 a logo, and they were -- they were there for the

1 turbines. They weren't there for, you know, anything
2 else.

3 Q. Were you doing work in the areas where the
4 turbines were located on the Adams while it was being
5 worked on?

6 MR. JAMISON: Overbroad, assumes facts,
7 calls for speculation, apparently an attempt to impeach
8 his witness, misstates prior testimony.

9 A. If you're in the engineering spaces, you're
10 near the turbines. It was a small space. Any work
11 being done on the turbine, we were in the area, no more
12 than 6, 7 feet away farthest, so, yes.

13 BY MR. ARCHER:

14 Q. Did you -- while work was being done on the
15 turbines, did you just take a vacation or something?

16 A. We were there every day. We were there
17 every day.

18 MR. JAMISON: If you guys can slow down so
19 I can get my objections in.

20 Objection; argumentative, assumes facts,
21 incomplete hypothetical, calls for speculation.

22 BY MR. ARCHER:

23 Q. You're doing work -- well, I'm going to ask
24 you. Were you doing work while turbines were being
25 worked on, on the Adams?

MR. JAMISON: Same objection; also leading.

A. Yeah, we were working on other components adjacent to -- there's -- there's two sides. There's passageways on both sides. We were working everywhere in the engineering spaces, 13 of us working everywhere. We were there all the time.

BY MR. ARCHER:

Q. Were the turbine insulating blankets removed from the turbines at some point to work on the turbines?

MR. JAMISON: Objection; asked and answered, leading, misstates all of Mr. Hultner's prior testimony, assumes facts, lacks foundation.

A. They had to be removed to have access to the turbines.

BY MR. ARCHER:

Q. ++ You told the guy sitting on my left that the -- I think he talked you into the fact that those turbines were removed.

Is that what you know and what you can say or were they left there? I don't -- because I want to find out if -- if he talked you into it or if what you know is what you know.

MR. JAMISON: Madam Court Reporter, please mark that question. I think there's an ethical issue

1 that needs to be raised with the magistrate.

2 Assumes facts, calls for speculation,
3 leading, incomplete hypothetical, harassing,
4 argumentative.

5 BY MR. ARCHER:

6 Q. Do you have my question in mind?

7 A. I'm thinking about it. Rephrase it one more
8 time. I want to make sure I got it right.

9 Q. Were the turbines removed?

10 A. During the shipyard overhaul, they would
11 have been removed. They were removed.

12 Q. Are you able to say, from what you
13 experienced and your knowledge, that you were exposed
14 to dust from the turbine generator blankets?

15 MR. JAMISON: Objection; calls for expert
16 opinion, calls for speculation, assumes facts,
17 misstates prior testimony, argumentative, and
18 harassing.

19 BY MR. ARCHER:

20 Q. During the overhaul?

21 A. Yes. Blankets were removed. They sit there
22 for long periods of time for heat resistant. They
23 deteriorate. They create dust. They fall apart. Yes,
24 dust was there.

25 MR. JAMISON: Move to strike those portions

1 in absolute conflict with prior testimony, those
2 lacking in foundation, and those based upon
3 speculation.

4 BY MR. ARCHER:

5 Q. What are field days?

6 A. Field days are cleanup days where all hands
7 on board, wiping down walls, wiping down equipment,
8 wiping down piping valves -- anything that would
9 have -- it's debris, dust. It's getting the ship ready
10 to be -- it has to be spotless. You're just wiping
11 down everything, making sure everything is spick and
12 span.

13 Q. Were the GE folks who were there overseeing
14 the work on the turbines, were -- were they wearing
15 masks?

16 MR. JAMISON: Assumes facts, leading,
17 overbroad, argumentative, calls for speculation, lacks
18 foundation.

19 A. I don't recall if they were wearing masks or
20 not.

21 BY MR. ARCHER:

22 Q. If they were wearing masks, would that be
23 something you likely would have -- would know?

24 MR. JAMISON: Incomplete hypothetical,
25 assumes facts, leading, argumentative, calls for

1 speculation.

2 A. If they were wearing masks, I would be
3 concerned as to why they're wearing masks. But I
4 don't -- I don't know that they were wearing masks or
5 not.

6 BY MR. ARCHER:

7 Q. I'm asking you if you know if they were
8 wearing masks.

9 Did you ever feel any concern with, "Hey, why
10 are these guys wearing masks?," while the turbines were
11 being worked on? Did you ever have that thought in
12 your head?

13 MR. JAMISON: Objection; three questions
14 asked. They are compound, overbroad, leading, assumes
15 facts, calls for speculation, lacks foundation.

16 BY MR. ARCHER:

17 Q. Do you have my question in mind?

18 A. Yes. Whenever anybody was back there with a
19 mask on, we were concerned because we were not provided
20 masks.

21 MR. JAMISON: Move to strike the
22 nonresponsive portions based on speculation.

23 BY MR. ARCHER:

24 Q. Did the turbine generator blankets fit the
25 turbines exactly like a glove?

1 A. They were designed to fit exactly like a
2 glove.

3 MR. JAMISON: Leading to the last question,
4 calls for speculation, lacks foundation.

5 BY MR. ARCHER:

6 Q. Would the turbines work and function
7 effectively, if at all, if they didn't have the
8 asbestos blankets on them?

9 A. No. They spin too fast. They would get too
10 hot. They would -- I don't know what -- how long they
11 would last or anything, but they would get too hot.
12 It's extremely hot back there, and that's the main
13 source of the heat in your room is the turbines.

14 MR. JAMISON: Can you allow me to lodge
15 late objections, because you guys are --

16 MR. ARCHER: Yeah, we can just say this:
17 All of your objections are preserved --

18 MR. JAMISON: No, because it's just -- I
19 need --

20 MR. ARCHER: -- forever.

21 MR. JAMISON: -- the sky was blue and now
22 it's dark outside.

23 Leading, assumes facts, lacks foundation,
24 incomplete hypothetical, misstates prior testimony,
25 overbroad, vague and ambiguous.

1 BY MR. ARCHER:

2 Q. ++ Is it dark outside?

3 A. It's light outside.

4 MR. JAMISON: Argumentative.

5 BY MR. ARCHER:

6 Q. ++ Is the sky blue? Can you see blue sky
7 outside right now, outside that window even though
8 there's a cover over it?

9 A. I see blue sky.

10 MR. JAMISON: Madam Court Reporter, please
11 mark those last two questions.

12 BY MR. ARCHER:

13 Q. ++ I mean, I'm just pointing. There's like
14 a little screen over the window, right? And there's
15 some scaffolding outside that window, and -- but you --
16 am I right? You can see through that little screen out
17 there into the outside. Am I right or am I wrong?

18 MR. JAMISON: Objection; argumentative
19 compound, harassing.

20 BY MR. ARCHER:

21 Q. ++ Am I right or am I wrong?

22 A. You're right. I can see the sky.

23 Q. ++ looks blue to me. What does it look like
24 to you?

25 A. It's looks blue.

1 MR. JAMISON: Objection. Calls for
2 speculation, calls for expert opinion, assumes facts,
3 lacks foundation.

4 A. By wiping down the pads, the insulating
5 pads. Wiping them down and getting any dust off of
6 them. We didn't -- you know, you could -- you could
7 blow them down, you could wipe them down, but we had to
8 get -- we had to remove the dust. And any dust back
9 there doesn't come from anything other than
10 deteriorating pads.

11 We -- because our poopie suits were made out of
12 polyester. So that doesn't flake off and dust or
13 anything. There's nothing back there that creates --
14 dust doesn't -- you don't have dust on a submarine.
15 You don't have that.

16 MR. JAMISON: Move to strike those portions
17 based upon speculation, lacking foundation, and calling
18 for an expert opinion.

19 BY MR. ARCHER:

20 Q. Is it right that there was no dust on the
21 submarine or that dust needed to be taken care of
22 lickety-split on the spot on the submarine?

23 A. It's -- it's continually cleaned. It's
24 taken care of right away.

25 Q. I just want to make sure we understand and

1 the jury understands that there was dust --

2 A. There is dust --

3 Q. -- created from -- hold on -- from the work
4 that you and others did. However, it was taken care
5 of. Is that right or wrong?

6 A. No. That's right. We -- we clean up as we
7 go. It's a -- you're constantly cleaning.

8 Q. And when Bailey was asking you about
9 De Laval pump work a little while back, your -- one of
10 your answers was "it's possible." Right?

11 What I'm asking you is: From what you know,
12 what you experienced, and your -- and, you know, what
13 you understand from the work you did, were the gaskets
14 and the packing asbestos that you removed and replaced
15 on the De Laval pumps?

16 MR. BAILEY: Lacks foundation, speculation,
17 assumes facts not in evidence, and misstates testimony.

18 A. Going back, all the pumps we worked on had
19 the asbestos gaskets and they were removed and
20 replaced.

21 BY MR. ARCHER:

22 Q. What about packing?

23 A. And packing as well.

24 Q. How often did you guys do field day work?
25 Was that a once-in-a-great-while thing or what?

1 A. Pretty much. I was watching it.

2 Q. Is there any other work on the USS John
3 Adams that was ever done by you or someone in your
4 presence on any turbine aboard that ship during the
5 time you served on her?

6 MR. ARCHER: Overbroad as to "any other,"
7 assumes facts.

8 MR. JAMISON: Let me -- let me strike the
9 question.

10 BY MR. JAMISON:

11 Q. Excluding lube oil work (indiscernible)
12 that's connected to the turbine --

13 (Certified Stenographer seeks
14 clarification.)

15 BY MR. JAMISON:

16 Q. Excluding lube oil system work related to
17 the turbines, perhaps, or other systems unrelated to
18 the actual turbine itself, is there any other work that
19 you did or you saw others do to that turbine during
20 the -- any turbine on board the USS John Adams when you
21 were assigned to her?

22 MR. ARCHER: Same.

23 A. No. I don't even -- no, that's a big-ticket
24 item that -- that work would have been -- even if it
25 would have blown up at sea, we would have isolated that

1 and come back into the tender to have that work done.

2 That was beyond our expertise.

3 BY MR. JAMISON:

4 Q. Last week I had asked you about did you ever
5 speak with any person that you, in your lifetime, that
6 you understand was employed by GE; and the response was
7 no. In response to Mr. Archer's question, you said
8 that there was GE reps present.

9 A. That doesn't mean we talked.

10 Q. Okay. So -- and that's a good starting
11 spot. You never spoke with someone in your life,
12 including aboard the USS John Adams, that was a
13 representative of General Electric. Fair?

14 A. I was shown a document in my -- in my
15 service record where I went to a three-day school on
16 turbines. So that would have been given by GE people.
17 I just don't recall the three-day school, but
18 apparently I was there.

19 Q. And whether that was, I think, sometimes
20 there's NObs contracts, whether that was a NObs
21 contract through a shipyard turbine expert or whether
22 or not that was really GE teaching that class, I
23 believe, last week you said you just don't -- don't
24 remember. Is that fair?

25 A. That's fair.

1 Q. So GE reps -- it sounded to me like when Ron
2 was asking you questions, that you recalled people that
3 you believe were employed by GE aboard the ship during
4 the overhaul. Is that fair?

5 A. It would have been guiding the removal of
6 the turbine.

7 Q. Okay. And so it sounds to me like these
8 persons' roles with regard to the ship during that
9 overhaul, first and foremost related primarily with the
10 shipyard workers; is that right?

11 MR. ARCHER: Foundation, overbroad, assumes
12 facts.

13 BY MR. JAMISON:

14 Q. And they were there to --

15 THE CERTIFIED STENOGRAPHER: Excuse me. I
16 need the answer, please.

17 A. Yes. They were associated with the shipyard
18 workers.

19 MR. JAMISON: And you got the objection
20 too?

21 THE CERTIFIED STENOGRAPHER: Correct.

22 BY MR. JAMISON:

23 Q. What they did or didn't discuss with the
24 shipyard workers with regards to insulation, the actual
25 disconnection or whatnot, you weren't involved in that